

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON	:	Civil Action No. 3:16-md-2738-FLW-
TALCUM POWDER PRODUCTS	:	LHG
MARKETING, SALES PRACTICES	:	
AND PRODUCTS LIABILITY	:	MDL No. 2738
LITIGATION	:	
	:	
	:	
	:	
This Document Relates to: All	:	
Plaintiffs	:	
	:	

CROSS-NOTICE OF ORAL AND VIDEOTAPED DEPOSITION OF
LORENA TELOFSKI

PLEASE TAKE NOTICE that, in connection with *Betty Fitzhugh v. Johnson & Johnson, et al.*, Case No. CACE-19-001150, in the Circuit Court of the 17th Judicial Circuit In and For Broward County, Florida, Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (“Johnson & Johnson Defendants”), pursuant to the Federal and Florida Rules of Civil Procedure, cross-notice the videotaped deposition upon oral examination of **Lorena Telofski**, before a person duly authorized to administer oaths, on **February 24, 2021 at 10:00 am (eastern time) via video conference**, pursuant to the *Amended Notice of Oral and Video Deposition of Lorena Telofski*, as served and attached as Exhibit “A” hereto.

The deposition will be conducted pursuant to the provisions of the Federal and Florida Rules of Civil Procedure. You may appear and examine the witness following completion of the *Fitzhugh* deposition.

Dated: February 16, 2021

s/Susan M. Sharko

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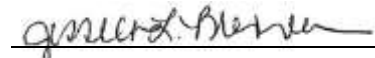
CERTIFICATION OF SERVICE

I hereby certify that I have, on this 16th day of February, 2021, caused the foregoing Cross-Notice of Oral and Videotaped Deposition of Lorena Telofski to be served on all counsel of record via ECF, including:

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Jessica L. Brennan

EXHIBIT A

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

BETTY FITZHUGH,

Plaintiff,

v.

JOHNSON & JOHNSON, INC.;
JOHNSON & JOHNSON CONSUMER,
INC. f/k/a JOHNSON & JOHNSON
CONSUMER COMPANIES, INC.;
IMERYS TALC AMERICA, INC., f/k/a
LUZENAC AMERICA, INC., f/k/a RIO
TINTO MINERALS, INC.; PTI UNION,
LLC; PTI ROYSTON, LLC;
BROADVIEW INVESTMENTS, LLC;
and PUBLIX SUPER MARKETS, INC.,

Defendants.

Case No.: CACE-19-001150

**PLAINTIFF'S AMENDED NOTICE OF TAKING ORAL AND VIDEOTAPED
DEPOSITION OF LORENA TELOFSKI DUCES TECUM**

PLEASE TAKE NOTICE that, pursuant to the Florida Rules of Civil Procedure, Plaintiff, by her undersigned attorneys, will take the videotaped deposition by oral examination of Lorena Telofski. The deposition which shall be taken by stenographic means before a certified court reporter or other person authorized to administer oaths will commence on **February 24, 2021 at 10:00 a.m.**, EST via ZOOM video conference, or at another location as agreed upon by all parties, and will continue from day to day until completed. The deposition will be taken before Golkow Reporting, or some other officer authorized to take depositions. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of the Court.

The witness is requested to produce true, correct and complete copies of all documents,

materials and information listed in **Schedule A**, no later than two (2) weeks prior to the deposition.

DATED: February 9, 2021

Respectfully Submitted,

/s/ David P. Dearing
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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 9th day of February, 2021, we electronically filed the foregoing via the Florida Courts e-Filing Portal which will serve a true and correct copy to the email addresses listed on the attached service list.

/s/ David P. Dearing
DAVID P. DEARING

SCHEDULE "A"
Duces Tecum

The deponent is hereby directed to produce true, correct and complete copies of all documents, materials and information listed below:

DEFINITIONS:

The term "document(s)" means and refers to all forms of writings and records, and includes any reduction to tangible form, including computer or magnetic memory or storage, or any other electronically stored information, communication, or data, including any written, recorded, or filmed graphic matter of any kind or nature, however produced or reproduced, including originals, drafts, and non-identical copies, wherever located including, but not limited to, documents and records held or stored on hospital servers, databases, networks, shared networks, local and remote drives, and local and remote drives of individuals.

DOCUMENTS REQUESTED:

1. A copy of the witness's current or most recent resume or curriculum vitae.
2. The witness's complete personnel file, including but not limited to, any and all performance reviews and personnel records that relate or refer to the witness's work on Johnson's Baby Powder and any other talcum powder products.
3. Any and all documents pertaining to the witness's compensation while employed by Johnson and Johnson or any of its subsidiary companies.
4. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the presence of asbestos in Johnson's Baby Powder, Shower to Shower, or other talcum powder products.
5. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between talc and ovarian cancer.
6. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between Johnson's Baby Powder, Shower to Shower, or other talcum powder products and ovarian cancer.

7. Any and all documents in the witness's possession, custody, or control which discuss, mention, consider, or contemplate the association between asbestos and ovarian cancer.
8. Any documents reflecting communications with J&J, including its lawyers regarding talcum powder products.
9. Any communications with Susan Nicholson, since leaving J&J.
10. Any and all documents which refer or relate to any of the following people or entities relating to talcum powder products:
 - a. Imerys or any of its predecessor companies including Rio Tinto and Luzenac
 - b. Crowell and Moring, including Ridgeway Hall
 - c. Robert Glenn
 - d. Meta-Analysis Research Group,
 - e. Joshua Muscat MD
 - f. Michael Huncharek, MD
 - g. Brooke Mossman, PhD
11. Any and all documents relating to IARC's consideration of talc as a human carcinogen.
12. All communication with the FDA concerning Johnson's talcum powder products.
13. All communications with or about Rich Zazenski relating to talcum powder products.
14. All communications with or about John Hopkins relating to talcum powder product.
15. All communications with or about Center for Regulatory Effectiveness (CRE), Multinational Business Services (MBS), Multinational Legal Services (MLS), Bill Kelly, Jim Tozzi, or Alfred Wehner relating to talcum powder products.